

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**LEON WEINGRAD, individually and on
behalf of all others similarly situated,**

Plaintiff,

v.

IBAN GLOBAL LLC

and

**LIVEFREE EMERGENCY RESPONSE,
INC. D/B/A LIFEBEACON**

Defendants.

Case No. 24-4212

Oral Argument Requested

**DEFENDANT LIVEFREE EMERGENCY RESPONSE, INC.'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT
UNDER RULE 12(b)(2) FOR LACK OF PERSONAL JURISDICTION**

Defendant LiveFree Emergency Response, Inc. d/b/a LifeBeacon ("Defendant" or "LiveFree"), through undersigned counsel, and for the reasons set forth in the accompanying Memorandum of Law, hereby moves to dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(2) for Lack of Personal Jurisdiction.

Respectfully submitted,

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